

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE STANDARD CHANGES, 2012

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INITIAL COMMENTS OF DAVID B. POPKIN

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Respectfully submitted,

N20121COMMENTS

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There are a number of points that I would like to make with respect to the Postal Service's proposal to change the service standards.

1. The recipient of a mail piece has no control over when or where the sender of the mail piece will deposit the mail and is at the mercy of the Postal Service.
2. The Postal Service believes that a mailer can just mail their letter a day or two earlier to meet the new service standards. This concept can be taken to an extreme and if the Postal Service were to change the local delivery to five months, I can just send out my Christmas cards this week.
3. The Postal Service does very little to publicize the service standards to all but the major mailers. For example, the changes that were implemented earlier this month were not posted in my local post office for customers to see. They make a point in their survey results that mailers are not aware of the actual service standards.
4. Over the past few years, the Postal Service has made a number of other independent proposals to change the level of service on a national basis such as closing of post offices, changing the hours of post offices, eliminating Saturday

delivery, eliminate Saturday mail processing. The Postal Service is treating these in a vacuum.

Let's look at what can be the combined effect of all of these changes. Assume that I am located next door to a post office that has a 5 PM dispatch to the processing center. If I walk next door and mail a letter at 4 PM on Monday that is going to another addressee within the overnight delivery area, it will be delivered on Tuesday.

Now assume that my post office is closed down and that I now receive delivery by a rural route operating out of another office and the carrier passes my box at 1 PM.

If I place a letter in my mail box in front of my location at the same 4 PM on Monday, the carrier will pick up the letter at 1 PM on Tuesday. Assume that when this carrier returns to the office, the final dispatch to the processing center has already been made; the letter will not be dispatched until Wednesday.

Assume that the delivery standards for my letter are one of those that have changed from overnight to a three-day delivery. The letter will arrive at its destination on Saturday and therefore will not be delivered until the following Monday or six days after the original conditions.

This does not take into account the possibility of a holiday